

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

JUDY JIEN, et al.,

Plaintiffs,

v.

PERDUE FARMS, INC., et al.,

Defendants.

C.A. No. 1:19-cv-02521-SAG

**PLAINTIFFS' AND DEFENDANT  
PILGRIM'S PRIDE CORPORATION'S  
JOINT NOTICE OF SETTLEMENT  
AND STIPULATION FOR  
SUSPENSION OF PROCEEDINGS**

Plaintiffs and Defendant Pilgrim's Pride Corporation ("Pilgrim's" and, together with Plaintiffs, the "Parties") respectfully write to the Court to provide notice that Plaintiffs have reached an agreement with Pilgrim's to settle all claims against Pilgrim's. This agreement is subject to the Court's approval pursuant to Federal Rule of Civil Procedure 23. Consistent with the Parties' agreement, Plaintiffs will move for preliminary approval of a proposed settlement in the near future.

The Parties further stipulate that all proceedings between them be suspended by the Court consistent with the terms of their settlement agreement, which will be provided to the Court in connection with Plaintiffs' motion for preliminary approval of the proposed settlement.

Dated: June 16, 2021

Respectfully submitted,

/s/ Brent W. Johnson

Daniel A. Small (D. Md. Bar # 20279)

Benjamin D. Brown (admitted *pro hac vice*)

Brent W. Johnson (admitted *pro hac vice*)

Daniel H. Silverman (admitted *pro hac vice*)

Alison S. Deich (admitted *pro hac vice*)

Zachary R. Glubiak (D. Md. Bar # 20962)

COHEN MILSTEIN SELLERS & TOLL PLLC

1100 New York Avenue NW

5th Floor

Washington, DC 20005  
Telephone: (202) 408-4600  
Fax: (202) 408-4699  
dsmall@cohenmilstein.com  
bbrown@cohenmilstein.com  
bjohnson@cohenmilstein.com  
dsilverman@cohenmilstein.com  
adeich@cohenmilstein.com  
zglubiak@cohenmilstein.com

Steven W. Berman (admitted *pro hac vice*)  
Breanna Van Engelen (admitted *pro hac vice*)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
1301 Second Avenue, Suite 2000  
Seattle, Washington 98101  
Tel: (206) 623-7292  
steve@hbsslaw.com  
breannav@hbsslaw.com

Shana E. Scarlett (admitted *pro hac vice*)  
Rio R. Pierce (admitted *pro hac vice*)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
Tel: (510) 725-3000  
shanas@hbsslaw.com  
riop@hbsslaw.com

George F. Farah (admitted *pro hac vice*)  
Rebecca P. Chang (admitted *pro hac vice*)  
HANDLEY FARAH & ANDERSON PLLC  
33 Irving Place  
New York, NY 10003  
Telephone: (212) 477 8090  
gfarah@hfajustice.com  
rchang@hfajustice.com

Matthew K. Handley (D. Md. Bar # 18636)  
Rachel E. Nadas (admitted *pro hac vice*)  
HANDLEY FARAH & ANDERSON PLLC  
200 Massachusetts Ave, Seventh Floor  
Washington, DC 20001  
Telephone: (202) 559-2433  
mhandley@hfajustice.com  
rnadas@hfajustice.com

William Anderson (admitted *pro hac vice*)  
HANDLEY FARAH & ANDERSON PLLC  
4730 Table Mesa  
Drive Suite G-200  
Boulder, CO 80305  
Telephone: (202) 559-2433  
wanderson@hfajustice.com

*Interim Co-Lead Counsel for Plaintiffs and the  
Proposed Class*

/s/ Carrie C. Mahan

Carrie C. Mahan  
Christopher J. Abbott  
WEIL GOTSHAL & MANGES LLP  
2001 M Street N.W., Suite 600  
Washington, D.C. 20036  
Telephone: (202) 682-7000  
Facsimile: (202) 857-0940  
carrie.mahan@weil.com  
christopher.abbott@weil.com

*Counsel for Pilgrim's Pride Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice to counsel for all parties that have appeared in this case.

/s/ Brent W. Johnson